

Continuation of Application for Criminal Complaint

I, Geoffrey Yandl, being duly sworn, hereby depose and state as follows:

Introduction and Background

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), and am currently assigned to the Grand Rapids, Michigan, Field Office. I have been employed as a Special Agent with ATF since 2007, prior to which I was a Special Agent with the U.S. Secret Service for four years. I have been involved in numerous investigations of violations of federal laws.

2. I am authorized to investigate violations of laws of the United States and to execute warrants issued. As a Special Agent with ATF, my primary duties include the investigation of alleged violations of federal firearm laws, including the subject offense of 18 U.S.C. § 922(g)(1), which makes it illegal to possess a firearm when previously convicted of a crime punishable by more than a year of incarceration (Felon in Possession of a Firearm).

3. I submit this Continuation in support of a Criminal Complaint and Arrest Warrant for John Theodore DEVRIES. As set forth below, there is probable cause to believe that DEVRIES committed a violation of 18 U.S.C § 922(g)(1) (Felon in Possession of a Firearm) on May 26, 2023.

4. The information contained in this continuation is based upon information obtained in part on: (a) my personal participation in this investigation; (b) information provided by other law enforcement officers; (c) criminal history records; and (d) my personal training and experience and the training and experience of other law enforcement personnel. This continuation does not contain all the

information known as a result of this investigation, but only those facts that I believe are necessary to establish probable cause to show that DEVRIES committed a violation of 18 U.S.C § 922(g)(1) (Felon in Possession of a Firearm) on May 26, 2023.

Probable Cause

5. In 2016, after pleading guilty in Ottawa County, Michigan, John Theodore DEVRIES was sentenced to a minimum of four years and six months in prison for Felony Assault with Intent to Rob while Armed. DEVRIES was discharged from the Michigan Department of Corrections (MDOC) on January 6, 2023. DEVRIES is prohibited from possessing a firearm due to having been previously convicted of a crime punishable by more than one year of incarceration.

6. On May 26, 2023, the Holland Department of Public Safety (HDPS) responded to the area of West 17th Street and Washington Avenue in Holland, Michigan for a report of DEVRIES carrying a concealed firearm. Undercover detectives conducting surveillance in the area had observed DEVRIES walking with a pistol in his waistband. The information was relayed to uniform HDPS officers. A uniform HDPS officer in a marked police vehicle approached DEVRIES as he was walking on foot. The officer told DEVRIES to stop walking and show his hands. DEVRIES had his hands in his pockets. The officer had to repeat the instructions several times before DEVRIES complied and showed the officer his hands. A second HDPS officer arrived, and DEVRIES was placed into handcuffs. A loaded pistol was located in DEVRIES' waistband as previously observed by the undercover detectives.

7. In a post-Miranda statement to HDPS Sgt. Dullock, DEVRIES admitted he recently purchased the pistol. DEVRIES admitted that he was recently released from prison and prohibited from legally possessing firearms. DEVRIES declined to discuss from whom or where he had purchased the pistol.

8. The firearm is specifically described as a Sig Sauer Model P320 M17 9mm caliber semiautomatic pistol. Your affiant, through training and experience in the determination of firearms travelling through interstate commerce, advises that the firearm was distributed from the State of New Hampshire. Therefore, the firearm would have traveled through and affected interstate commerce prior to its possession by DEVRIES.

Conclusion

9. Based on the aforementioned facts, I respectfully submit there is probable cause to believe that John Theodore DEVRIES committed a violation of 18 U.S.C. § 922(g)(1) (Felon in Possession of a Firearm).